



Dairy Rules Advisory Committee

August 5, 2020

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DRAC-Welcome

1. Welcome
2. Open Meeting Notice
3. Approve agenda
4. Public comments
5. Housekeeping



Today's Agenda

- Pandemic response from Dairy Services Section
- Dairy Services Section - Badger Bounce Back plan
- Process for posting new or revised procedures
- Bill updates
- Wisconsin's Grade A Program Evaluation
- Questions



Regulatory Pandemic Response

- Request for Flexibility – Grade A program
 - Dairy plants, intakes and product samples missed regulatory quarterly inspection.
 - Water samples had to be made up.
 - Farm inspections, state check surveys and labs missed had 120 days to complete.
 - Tanker inspections,
 - > 840 tankers needed inspections.
 - Provided permits with 6 months to get inspected.
 - Pasteurizer activities were deemed essential and continued during the Governor's Safer at Home initiative.



Temporary Licenses

- Revised licensing to be virtual or issued temporary licenses and permits
 - Plants
 - Farms
 - BMWS
 - Tankers
 - Labs



Focused Food Safety Calls to All Plants

- Briefly touch base with each dairy plant to improve the department's communication with industry.
- Detect early warning signs that may impact Wisconsin food supply.
- Help the department evaluate food safety needs during the pandemic.
- Provide link to the GovDelivery allowing them to sign up.



GovDelivery

- Inform industry of revised procedures and new rules.
- Provided at least 14 notices during the Safer at Home initiative.
- Intend to continue to using this platform as a communication tool.



Established Safety Measures

- Management team established personal protective equipment (PPE) procedures.
- Procured state-issued PPE and distributed to staff.
- We follow CDC guidance for essential personnel.
- Measures are being taken to minimize contact time at plants and farms:
 - Staff conducts daily self-assessments for symptoms.
 - PPE shall be worn on all inspections; social distancing practiced when possible.
 - Minimize number of people at a plant.
 - Staff visit only 1 plant per day.
 - Virtual record and food safety plan reviews when possible.
 - Developed a Dairy Services Section - Badger Bounce Back Plan.



Dairy Services Section - Badger Bounce Back Plan

- “Garden Hose vs. Fire Hose” – goal was to control speed of return back to field work.
- Conduct work with best social distancing – Farms.
- Minimize exposures for our staff and industry partners.
- Work to meet approved timeline in the request for flexibility.



DS Badger Bounce Back Plan

- June
 - Follow up on temporary licenses.
 - Issue exams for cheesemakers, graders and BMWS.
 - Farm inspections.
 - Appendix N known samples - revised process.
 - Plant, BTU and single service surveys.
 - Milk and water lab surveys.

Dairy Services Section - Badger Bounce Back Plan (cont.)

- July
 - Continue with all June activities
 - Grade A plants
 - Grade A receiving stations
 - Sampling

Dairy Services Section - Badger Bounce Back Plan, cont.

- August
 - Continue with all June and July activities
 - Grade B facilities
 - FDA manufactured foods contract work
 - Preventive control inspections
 - BMWS inspections at fairgrounds
 - Tanker inspections



Updating Procedures

- We are starting to post internal policies and procedures that interpret regulations.
- Updated documents are posted to the LRB and DATCP websites for comment.
- Please feel free to participate in the comment process.



Bill update

- rBST was passed in March and went into effect this week – “one and done” for producer affidavits.
- Grade A bulk milk tanker permit reciprocity passed in March.

Wisconsin's Grade "A" -- IMS Program FY 2020 Triennial State Evaluation

Strengths

1. In the previous report there were 9 plant check ratings (36%), 3 receiving stations (30%), and 8 farm check ratings (25%) with enforcement scores below 90. There were no check rating enforcement scores below 90 during this latest triennial period.
2. In 2011 Wisconsin began a Certified Industry Inspection program for tanker evaluations to make progress on the large number of expired tankers. Wisconsin State Statute 97.32 allows for the flexibility to assign Special Dairy and Food Inspectors. The number of tankers being inspected within the required frequency increased to 85%, up significantly from the 17% found in the previous evaluation.

Evaluation (Cont.)

3. The Field Services Section under the Bureau of Food and Recreational Businesses has structured its field supervisors to only supervise dairy or food and no longer both. This allows supervisors to better support the unique needs of the dairy program.

4. Quality staffing and continued education has helped bring the plant adverse action percentage down for all types of check ratings. **See summary as follows:**

Evaluation Timeframe →	2012 to 2016	2017 to 2019
Plant Adverse Action	32	10
Receiving/Transfer Station Adverse Action	20	0
BTU Adverse Action	32	25



Evaluation (cont.)

5. Since the previous evaluation, plant samplers evaluation has significantly improved, from 47% to 89%.
6. Bulk milk samplers are found to be permitted at a rate of 82%. The frequency of permitting has greatly improved from 56% in the previous evaluation to 73% over the past 3 years (over 82% in 2019 found during 24 check ratings).

Evaluation also noted that Wisconsin is participating in the Preventive Controls Pilot Program.



Program Evaluation - Weaknesses

- Performance-based farm inspections – adverse reactions.
- Farm water violations:
 - PMO requires plate cooler bypass.
 - Well set-back distances compliance reports.
- Plant construction and repair violations



FDA's recommendations

- ***Recommendation:*** WDATCP regulatory needs the ability to record and maintain a complete water system history when farms have multiple water systems that require separate samples.
- ***Recommendation:*** WDATCP should not be allowing plants to operate under broken seals without qualifying plant operators through a reseal certification program. ATCP 65 should include a requirement for permission from Regulatory for any temporary sealing incident.



In Summary



Questions